

1 John P. Aldrich, Esq.  
2 Nevada Bar No. 6877  
Catherine Hernandez, Esq.  
Nevada Bar No. 8410  
3 **ALDRICH LAW FIRM, LTD.**  
7866 West Sahara Avenue  
4 Las Vegas, NV 89117  
Telephone: (702) 853-5490  
5 Facsimile: (702) 227-1975  
*Attorneys for Plaintiff*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MEDARC, LLC, as Collection Agent for  
9 Jeffrey H. Mims, Trustee of the Liquidating  
Trust of Revolution Monitoring, LLC,  
10 Revolution Monitoring Management, LLC, and  
Revolution Neuromonitoring, LLC,

11 Plaintiff,

12 vs.

13 UMR, INC. SUCCESSOR TO  
14 COMMONWEALTH ADMINISTRATORS,  
LLC, a Wisconsin limited liability company;  
15 WPS, a Wisconsin corporation; CARE  
IMPROVEMENT PLUS GROUP  
16 MANAGEMENT, LLC, a Texas limited  
liability company; TRIWEST HEALTHCARE  
17 ALLIANCE CORP., an Arizona corporation;  
CULINARY HEALTH FUND  
18 ADMINISTRATIVE SERVICES, LLC, a  
Nevada limited liability company; BOON-  
19 CHAPMAN BENEFIT ADMINISTRATORS,  
INC., a Texas corporation; HEALTH PLAN OF  
20 NEVADA INC., a Nevada corporation;  
SIERRA HEALTH AND LIFE INSURANCE  
21 COMPANY, INC., a Nevada corporation;  
TEACHERS HEALTH TRUST, a Nevada  
22 corporation; TELLIGEN INC, an Iowa  
corporation; LAS VEGAS METROPOLITAN  
23 POLICE DEPARTMENT HEALTH AND  
WELFARE TRUST, a Nevada corporation;

CASE NO.: 2:21-cv-00286-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO MOTION TO DISMISS [ECF NO.  
26] (SECOND REQUEST)**

1 SOUTHWEST SERVICE  
2 ADMINISTRATORS INC, a Tennessee  
3 corporation; LOOMIS BENEFITS, INC., a  
Nevada corporation; DOES 1-10, inclusive; and  
ROE CORPORATIONS 1-10, inclusive,

4 Defendants.

5

6 **IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN** Plaintiff  
7 MEDARC, LLC, as Collection Agent for Jeffrey H. Mims, Trustee of the Liquidating Trust of  
8 Revolution Monitoring, LLC, Revolution Monitoring Management, LLC, and Revolution  
9 Neuromonitoring, LLC (“Plaintiff”) and Defendant Culinary Health Fund Administrative Services,  
10 LLC (“Defendant”) (collectively “the Parties”), by and through their undersigned counsel, to extend  
11 the deadline for Plaintiff to respond to Defendant’s Motion to Dismiss (“Motion”) (ECF No. 26).  
12 The current deadline for Plaintiff’s Response is April 12, 2021. On April 1, 2021, counsel for  
13 Plaintiff filed a Motion to Withdraw as Attorney of Record. Undersigned counsel stipulates to  
14 extend the deadline for Plaintiff’s Response to the Motion until two weeks after Plaintiff has  
15 retained new counsel, or by April 30, 2021, whichever is sooner. This is the second stipulation for  
16 an extension of time to respond to the Motion. This request is not intended to cause delay or  
17 prejudice any party.

18 **NOW, THEREFORE, IT IS STIPULATED AND AGREED** by and between the Parties  
19 that the time for Plaintiff to respond to Defendants’ Motion to Dismiss is extended to two weeks  
20 after Plaintiff has retained new counsel, or by April 30, 2021, whichever is sooner.

21 ///

22 ///

23 ///

1 Dated this 12<sup>th</sup> day of April, 2021.

2 **ALDRICH LAW FIRM, LTD.**

3 /s/ John P. Aldrich

4 John P. Aldrich, Esq.  
Nevada Bar No. 6877  
Catherine Hernandez, Esq.  
5 Nevada Bar No. 8410  
7866 West Sahara Avenue  
6 Las Vegas, NV 89117  
Telephone: (702) 853-5490  
7 Facsimile: (702) 227-1975  
*Attorneys for Plaintiff*

Dated this 12<sup>th</sup> day of April, 2021.

**BROWNSTEIN HYATT FARBER SCHRECK, LLP**

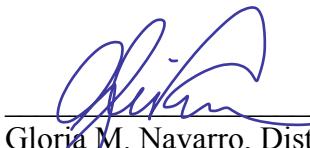
/s/ William D. Nobriga  
Bryce C. Loveland, Esq.  
Nevada Bar No. 10132  
William D. Nobriga, Esq.  
Nevada Bar No. 14931  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
Telephone: 702.382.2101  
Facsimile: 702.382.8135  
*Attorneys for Defendant, Culinary Health Fund Administrative Services, LLC*

10 **ORDER**

11  
12 **IT IS SO ORDERED.**

13 Dated this 12 day of April, 2021.

14  
15  
16 Respectfully submitted by:  
17 **ALDRICH LAW FIRM, LTD.**

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

18 /s/ John P. Aldrich

19 John P. Aldrich, Esq.  
Nevada Bar No. 6877  
Catherine Hernandez, Esq.  
20 Nevada Bar No. 8410  
7866 West Sahara Avenue  
21 Las Vegas, Nevada 89117  
*Attorneys for Plaintiff*

22

23

24